

RD AN No. 3761 (4284-G)
May 28, 2002

SUBJECT: Rural Business Opportunity Grant Program
Clarification of Indirect Costs

TO: State Directors, Rural Development

ATTN: Business Program Directors

PURPOSE/INTENDED OUTCOME:

The purpose of this Administrative Notice (AN) is to provide additional guidance on indirect cost rate proposals as they relate to the Rural Business Opportunity Grant (RBOG) program.

COMPARISON WITH PREVIOUS AN:

This AN replaces expired RD AN No. 3649 (4284-G) dated May 16, 2001.

IMPLEMENTATION RESPONSIBILITIES:

Guidance on indirect cost rate proposals can be found in the following Office of Management and Budget (OMB) circulars:

- OMB Circular A-21, "Cost Principles for Educational Institutions"
- OMB Circular A-87, "Cost Principles for State, Local, and Indian Tribal Governments"
- OMB Circular A-122, "Cost Principles for Nonprofit Organizations"

OMB Circular A-21 refers to facilities and administrative (F&A) costs throughout the circular. F&A costs are synonymous with indirect costs.

An indirect cost is defined as a cost that has been incurred for common or joint objectives and, therefore, cannot be readily identified with a particular final cost objective. An indirect cost rate is determined by the cognizant agency. An indirect cost rate is a ratio or percentage of an organization's total indirect costs to its direct cost base. The Federal agency with the largest dollar value of awards with an applicant will be designated the

EXPIRATION DATE:
May 31, 2003

FILING INSTRUCTIONS:
Preceding RD Instruction 4284-G

cognizant agency and responsible for negotiating and approving indirect cost rates. For example, an applicant has a grant award from the Department of Education for another project totaling \$500,000. The applicant makes an application for a different project with the Rural Business-Cooperative Service (RBS), and a grant is awarded for \$50,000. The Department of Education is the cognizant agency in this scenario because it has the most dollar value of awards with the applicant. The key element to remember is the total dollar value of all Federal awards for the applicant and not just the individual project. If no other Federal agency makes grant awards to the applicant, then RBS is the cognizant agency.

Some organizations already have approved indirect cost rates negotiated by their cognizant agency when they submit their applications to RBS. Rural Development State Offices may feel the indirect cost rates are too high for this Agency's portion of a project. If so, the State Office should contact the cognizant agency and ask that agency to negotiate with the applicant for a lower indirect cost rate on the RBS portion of the project.

If RBS is the cognizant agency, the State Office should submit the indirect cost rate proposal to the Specialty Lenders Division (SLD) after the grant is approved. The National Office has an agreement with the Food Safety and Inspection Service (FSIS) to determine indirect cost rates for the RBOG program. The Letter of Conditions should state that the indirect cost rate will not be approved until negotiated by FSIS. FSIS will work closely with the applicant in negotiating an indirect cost rate. Indirect cost rate determinations cover 1 fiscal year. Therefore, if the grant award is for more than 1 fiscal year, the rate must be renegotiated for the next fiscal year. Any indirect cost rate that needs to be renegotiated should be submitted to SLD.

SUMMARY:

The RBOG program is administered by Rural Development in accordance with RD Instruction 4284-G. OMB Circulars A-21, A-87, and A-122 provide guidelines regarding indirect cost rate proposals for grants. The State Office is responsible for assuring the requirements of RD Instruction 4284-G and the OMB circulars are adhered to in administering the RBOG program.

If you have any questions concerning the content of this AN, please call Diane Berger, Specialty Lenders Division Processing Branch, (202) 720-2383.

(Signed by Luis Luna)

JOHN ROSSO
Administrator